

Subject: TRI-CONTAINER POLREP #1 AMENDMENT

GF4

Date: December 4, 1994
From: John Martin, OSC
To: Director, ERB and Region 6
Subject: TRI Container Site
Catoosa, Rogers County, Oklahoma
POLREP: 01 Amendment

I. BACKGROUND

Site No: 7S
D.O. No: 0035-06-082
NPL Status: Non-NPL Site
CERCLIS No: OKD070040589
Start Date: 09/29/94
Response Authority: CERCLA
Approval Status: Action Memo approved September 21, 1994

II. INCIDENT INFORMATION

A. Site Description:

The TRI Container Site (formerly Tulsa Recon Co.) is the location of a former drum refurbishing and manufacturing facility that was abandoned about one year ago. TRI Container is located at 17400 E. Young St., Catoosa, OK 74116 (latitude 36°11'10" and longitude 95°47'15"). The Site occupies approximately ten acres with the fenced facility portion occupying five acres. There are several residences and businesses located within one mile and the Site is surrounded by woods and small hills. There are no major creeks or streams nearby. On-site drainage is eastward into the facility's unlined wastewater pond.

The property contains a large warehouse building divided into a north and south bay, two sheds, a large unlined wastewater pond, ten storage tanks with capacities ranging from 4,000 to 20,000 gallons, a large vat, and an estimated 8,000 drums. Approximately 90% of the drums are empty and the remaining 10% may hold volumes ranging from residual material to full. Many drums in the warehouse contain paint or other industrial products in plastic, steel, or fiber containers of various sizes. Most drums stored outdoors are 55-gallon capacity steel drums.

B. Preliminary Assessment Results:

Thirty samples from various areas of the site (drums, vat, soil, tanks and sediments) were taken for conducting the field hazardous characterization ("Haz Cat") procedures. The Haz Cat process screened and characterized each sample and the results

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were used to determine analytical parameters. Sixteen samples were sent for laboratory analysis, and twenty warning signs were posted around the fenced perimeter and openings in the fence were wired shut. The local officials placed padlocks on the gates.

Sample results from the TAT Site Assessment activities indicate the presence of several hazard classes that constitute RCRA characteristic hazardous wastes and CERCLA hazardous substances. Representative hazard classes present on-site are acidic liquids (pH < 2), basic liquid (pH > 12.5), flammable liquids/solids (flashpoint < 60 degrees celsius). A small room in the south bay of the warehouse had all three of these incompatible hazard classes stored together and may have resulted in a fire and/or explosion if they were to become mixed. The warehouse has been vandalized several times and has become increasingly dilapidated. Materials outside of the warehouse that were sampled showed the vat liquid (pH 1.9) to be a characteristic acid waste. The vat is full of sludge and liquid and has spilled over to the surrounding area.

C. Situation:

On November 6, 1993, vandals entered the TRI Container site and released an estimated 400 gallons of waste oil from an above-ground storage tank. Local and state officials immediately responded to the scene. A local cleanup contractor removed and stockpiled the contaminated soil onsite. Afterwards, state and local officials requested EPA's assistance in evaluating the situation. That waste oil release and the large quantity of drums at the facility drew considerable media attention.

On November 8, 1993, TAT visited the Site and observed several drums labeled "corrosive" and "flammable," six storage tanks with oily contents, several openings in the fence, and evidence that the Site is frequented by trespassers. Some of the drums were leaking substances onto the ground. During the week of November 15, 1993, the OSC and TAT visited the site to collect samples and post warning signs.

III. RESPONSE INFORMATION

A. Status of Actions:

The property owner had been notified of the pending necessary removal activities and he declined to participate financially. Therefore, crews were mobilized on 11/28/94 to the site to begin cleanup activities. Site preparatory activities began 11/29/94 and included site visits by utility vendors, clearing trash and debris from the warehouse, and receiving equipment (trailer, forklift, etc.). Local media visited the site to conduct interviews with the OSC regarding the removal action.

ERCS crews began inventory and staging of drums in the warehouse 12/01/94. Staging activities started in the South Bay warehouse where incompatible materials were stored in close proximity. Deteriorated drums were overpacked. Drums and containers were put on pallets and staged at the east side of the South Bay. Drum inventory in the South Bay was completed 12/04/94 and ERCS crews began inventory, overpacking and staging drums in the North Bay. Other activities included the beginning of clearing empty drums from the South Yard near the warehouse. A total to date of 132 drums and containers have been inventoried onto the drum log sheets.

B. Next Steps:

Continue the inventory and staging of the drums and containers of materials. The staged materials will then be Haz-Catted for waste stream grouping before offsite disposal. All data collected will be entered into ERT's DrumTrac software program.

C. Key Issues:

After all the drums have been inventoried and staged, the drum's label information will be used to consider further PRP enforcement activities.

IV. COST INFORMATION

	Amount Budgeted	Cost To Date 12/04/94	Amount (%) Remaining
ERCS	\$ 715,000	\$ 29,659.11	96 %
TAT	\$ 200,000	\$ 4,043.19	98 %
EPA	--	\$ 8,030.00	
TOTAL	\$1,240,000	\$ 41,732.30	97 %

TAT: Rick Neeley
STATUS: CASE PENDS